

EXHIBIT 7

SHANI A. PINNEY 30(b)(6)
Gov. U.S. Virgin Islands vs JP Morgan Chase

July 18, 2023

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1 UNITED STATES DISTRICT COURT FOR THE

2 SOUTHERN DISTRICT OF NEW YORK

3 CASE NUMBER: 22-CV-10904-JSR

4 ACTION FOR DAMAGES

5 GOVERNMENT OF THE UNITED STATES)
6 VIRGIN ISLANDS,)

7 Plaintiff,)

8 VS.)

9 JP MORGAN CHASE BANK, N.A.,)

10 Defendant.)

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14
15 VIDEO RECORDED DEPOSITION OF

16 SHANI A. PINNEY

17 30(B)(6) WITNESS

18 TUESDAY, JULY 18, 2023

19
20
21 REPORTED BY:

22 DENISE D. HARPER-FORDE
23 Certified Shorthand Reporter (CSR)
24 Certified RealTime Reporter (CRR)
25 Certified LiveNote Reporter (CLR)
Registered Professional Reporter (RPR)
Notary Public (FLORIDA)

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1 about Epstein.

2 (BY ATTORNEY O'LAUGHLIN):

3 Q. Did USVI DoJ monitor public
4 dockets for mentions of Epstein?

5 ATTORNEY ACKERMAN: Object to
6 form.

7 THE WITNESS: Not to my
8 knowledge, no.

9 (BY ATTORNEY O'LAUGHLIN):

10 Q. Why not?

11 ATTORNEY ACKERMAN: Object to
12 form, scope.

13 THE WITNESS: I'm not sure.

14 ATTORNEY O'LAUGHLIN: Let's
15 enter Tab 33 as Exhibit 2.

16 (Whereupon, Defendant's
17 Exhibit No. 2, PageSix.Com
18 Article, was marked for
19 identification)

20 (BY ATTORNEY O'LAUGHLIN):

21 Q. So this is an article dated
22 October 29th, 2007, by PageSix.com
23 with the title Epstein's Tropic Isle
24 of Babes.

25 The first sentence says, The

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1 to gather about Epstein, they made the
2 choice to put him at a 3.

3 I'm not sure if this risk
4 level determination, if that then
5 classifies the frequency he would have
6 to register had he been living in New
7 York.

8 Q. Did anyone reach out to New
9 York to get more information about the
10 risk level assignment that they had
11 done for Epstein?

12 A. If I remember, New York looked
13 at the entirety. They look at the
14 details, the initial charges,
15 everything. And that is how they
16 determine their risk levels. You
17 know, compared to the Virgin Islands,
18 we just solely look at what the
19 offender is found guilty of, and we
20 then put them into a tier.

21 In New York, their board, they
22 then determined the risk, and they put
23 him at -- they put him into tier 3.
24 And I think they concluded that, like
25 I said, just from looking at the

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1 entirety of his case, you know, the
2 initial charges, the age of the
3 victims, everything.

4 Q. So my question was just did
5 anyone reach out to New York to get
6 more information about the risk level
7 assignment that they had made for
8 Epstein?

9 A. Yeah. So I was saying that
10 yes, that we did. But if I -- if I
11 recall, the explanation was that they
12 looked at the entirety of the case.
13 That's what they explained.

14 Q. Who made that outreach?

15 A. I cannot recall.

16 Q. So what is your recollection
17 of what New York reported back based
18 on?

19 A. That they looked at the
20 entirety of the case, not just solely
21 what the -- what any offender is found
22 guilty of. They look at -- their risk
23 assessment looks at the details of the
24 case.

25 Q. Right. But what is that